

MEMO ENDORSED**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

USDS SDNY
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ELECTRONICALLY FILED
DOC #: _____
DATE FILED: <u>3/5/08</u>

UNI-SCREW EUROPE BV,**Plaintiff,****v.****UNISCREW WORLDWIDE, INC. and
STEWART TIPPING,****Defendants.**

No. 07 CV 7033 (PKC)(AJP)

*Application denied.
Plaintiff should
refile the documents
without reference
to privileged
or confidential
materials.*

PLAINTIFF'S MOTION TO FILE EXHIBITS UNDER SEAL

Plaintiff Uni-Screw Europe BV ("BV") hereby moves this Court pursuant to Fed. R. Civ. P. 26(c) for an order to file under seal certain documents relating to Plaintiff's Motion for Entry of Default Judgment, which was filed in the captioned case on January 17, 2008.

Exhibits A and B to the Declaration of Bruce J. Rose in Support of Plaintiff's Motion for Entry of Default Judgment (copies of which are attached only to the courtesy copy of this motion) are documents which detail the legal fees paid by the Plaintiff in connection with this Action, and contain confidential and privileged information regarding the services provided by counsel for the Plaintiff in connection with the prosecution of this case. The Declaration of Frank Romeijn in Support of Plaintiff's Motion for Entry of Default Judgment contains highly confidential information regarding the operating expenses of the Plaintiff. As such Plaintiff respectfully requests that the Court file these documents under seal.

There is still no protective order in place, as Defendant Uniscrew Worldwide Inc. has failed to appear in this Action, and we have been unable to effect service of the Complaint on Defendant Tipping.

*SO ORDERED
USDS
3-5-08*

Dated: January 17, 2007

Respectfully submitted,

/s/ Sarah C. Hsia

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